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August 25, 2003

Via US Mail and e-mail

Marianne Lamont Horinko, Acting Administrator
U.S. Environmental Protection Agency (EPA)
P.O. Box 1473
Merrifield, VA 22116

2003 AUG 27 PM 3:39

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**Re: Rubber and Plastic Additives (RAPA) Panel,
Partial Revision of HPV Chemical Challenge Program Submission
Sulfenamide Accelerators Category
2-(morpholinothio)-Benzothiazole (MBS), CAS No. 102-77-2
Category Justification and Testing Rationale**

Dear Ms. Horinko:

The RAPA Panel of the American Chemistry Council is pleased to submit the attached documents to EPA's High Production Volume (HPV) Chemical Challenge Program (Program) to fulfill our commitment for one of the 37 chemicals the RAPA Panel is voluntarily sponsoring in the Program. The RAPA Panel consists of the following member companies: Alco Chemicals; Bayer Polymers LLC; Ciba Specialty Chemicals Corporation; Crompton Corporation; Eliokem, Inc.; Flexsys America L.P.; The Goodyear Tire & Rubber Company; The Lubrizol Corporation; Noveon, Inc.; and, R.T. Vanderbilt Company, Inc.

This submission consists of a Test Plan and Robust Summaries for 2-(morpholinothio)-Benzothiazole (MBS; CAS number 102-77-2), and constitutes part of a revision of documents previously submitted to the Program by the RAPA Panel. In the previous submission, dated December 3, 2001, MBS was included in a category called "Sulfenamide Accelerators." After considering comments received, the Panel re-configured the category. Now MBS will be submitted as a single chemical rather than as part of a category. Documentation for the remaining category member will be submitted separately.

This current submission reflects consideration of comments received from EPA (dated August 14, 2002) and from Environmental Defense (dated May 7, 2002). While chemistry and hazard information for the chemicals in the former "Sulfenamide Accelerators" category overlap, the Panel will submit revised documentation for the two sponsored category chemicals individually to more clearly explain and substantiate the data. Thus, a Test Plan and Robust Summaries for the



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second sponsored chemical in the "Sulfenamide Accelerators" category, 4-O(morpholinethiocarbonyl)thioip Morpholine (CAS no. 13752-51-7) will be submitted separately.

In addition to the *Category Justification and Testing Rationale*, please also find attached robust summaries contained in IUCLID-formatted documents for MBS.

This submission is also being sent electronically to the following e-mail addresses:

Oppt.ncic@epa.gov
Chem.rtk@epa.gov

If you require additional information, please contact the RAPA Panel's technical contact, Dr. Anne P. LeHuray at (703) 741-5630 or anne_lehuray@americanchemistry.com.

Sincerely yours,

Courtney M. Price
Vice President, CHEMSTAR

Attachments